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PLEASE DO NOT REPLY TO THIS OFFICE

September 1, 2021

**MEMO ENDORSED**

**VIA ECF**

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. David Liranzo*  
19 Cr. 633 (ER)**


Dear Judge Ramos:

Please recall that I represent Mr. David Liranzo in his defense of the above-referenced matter. Mr. Liranzo is presently scheduled to appear before Your Honor on September 9, 2021 at 3:30 p.m. for a pretrial conference. For the reasons that follow, I write to respectfully request that Your Honor grant a two-week adjournment of the pretrial conference. This is the defense's first adjournment request in this matter. I have discussed this request with A.U.S.A. Nicholas Chiuchiolo, and the Government has no objection

The defense is in receipt of a proposed plea agreement dated August 19, 2021, and we are in the process of reviewing the agreement with Mr. Liranzo and answering his questions. Mr. Liranzo and I have scheduled a meeting for Tuesday, September 7, 2021 to continue our review of the proposed plea agreement.

Therefore, I write to respectfully request that Your Honor grant a two-week adjournment of the pretrial conference in the above-captioned matter in order to allow me to continue to review the proposed plea agreement with Mr. Liranzo and, if necessary, to continue ongoing negotiations with the Government. If the parties come to an agreement prior to the scheduled pretrial conference date, we will notify Chambers to seek a change of plea hearing date. The defense has no objection to the exclusion of time under the Speedy Trial Act. Thank you for your consideration.

Respectfully submitted,

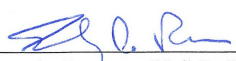
  
Mark I. Cohen, Esq.

MIC/gmf

Cc: A.U.S.A. Nicholas Chiuchiolo (via ECF)  
Mr. David Liranzo (via email)

Pretrial conference is adjourned from Sept. 1, 2021 to Oct. 1, 2021 at 10:30am.

Phone: (877) 411 9748.  
Access code: 3029857#

  
Edgardo Ramos, U.S.D.J.  
Dated: 09/03/21  
New York, New York